

# **EXHIBIT A**



U.S. Department of Justice

Antitrust Division

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April 19, 2012

BY FEDERAL EXPRESS

The Honorable Freda L. Wolfson  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Room 2020  
Trenton, New Jersey 08608

Re: *Vanduzer Lang Boyer v. Stein et al.*, No. 3:12 cv 1893

Dear Judge Wolfson:

The Antitrust Division of the United States Department of Justice ("Antitrust Division") writes to inform the Court that the Antitrust Division is conducting an ongoing criminal investigation into allegations that bidders rigged the auctions of municipal tax liens in New Jersey. To date, seven individuals have pleaded guilty as part of the investigation.

The *Vanduzer Lang Boyer* case currently before this Court concerns the same facts, parties, and legal theory as the Antitrust Division's investigation. Because of the overlap between *Vanduzer Lang Boyer* and this investigation, the Antitrust Division has an interest in limiting civil discovery in this parallel civil case. Accordingly, if the Court determines that discovery should proceed, we respectfully request that the Antitrust Division be given an opportunity to be heard on the timing and scope of discovery to ensure that it does not conflict with – and potentially compromise – the criminal prosecutions and ongoing investigation.

The Honorable Freda L. Wolfson

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We also advise the Court and the parties that we may request that further submissions by the Antitrust Division may be provided on an ex-parte basis to protect the confidentiality of the investigation, including the identity of cooperating witnesses and grand jury material.

Respectfully submitted,



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cc (via e-mail): All counsel of record